Remarks

Applicant has considered the Office Action mailed on July 19, 2006. Claims 1, 3-17 and 19-34 are pending in the present patent application. Of the pending claims, the Examiner rejected claims 1, 3-17 and 19-34. In response to the Office Action, Applicant amended claims 1, 12-13, 17, 28-29 and 33 to overcome the 35 USC §103(a) rejection and the 35 USC §112, second paragraph rejection. No new matter has been added. Applicant requests further examination and reconsideration of the present patent application.

The Examiner rejected claims 12-14 and 28-30 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Applicant amended claims 12-13 and 28-29 to qualify the term "urgent data". As amended these claims now recite that urgent data is data that is necessary for the computer system to make control decisions in near real-time with low latency. Support for this amendment is inferred from the descriptions provided on page 2, lines 15-17; page 12, line 4 through page 13, line 2; page 19, lines 5-18; and page 20, line 15 through page 21, line 13. As a result, Applicant believes that the §112, second paragraph rejection of claims 12-13 and 28-29 have been obviated. Claims 14 and 30 depend from claims 13 and 29, respectively, and thus overcome the §112, second paragraph rejection by

dependency. Accordingly, Applicant requests that the Examiner reconsider and remove the §112, second paragraph rejection of claims 12-14 and 28-30.

The Examiner rejected claims 1, 3-17 and 19-34 under 35 USC §103(a) as being unpatentable over Lambrecht (US Patent No. 5,809,261) in view of Lueck et al. (US Patent Application Publication No. 2005/0038947). Applicant respectfully traverses the §103(a) rejection of the present patent application and submits that claims 1, 3-17 and 19-34 are patentable over the combination of Lambrecht in view of Lueck et al. (Lueck).

Independent claims 1, 17 and 33 of the present invention now recite, *inter alia*, the limitation that the multiple TCL modules can communicate in parallel with their associated external devices with low latency. As is well known to skilled artisans, the term "low latency" generally refers to data that is near real-time data. Real-time data would have zero latency. In the present patent application, the multiple TCL modules have some latency in the data that is presented to the processor. As mentioned in the present patent application, an example of a low latency environment is with check sorter machines. In particular, check sorter machines can use data that is only a few microseconds stale because it is just as useful as data that is in real-time.

Another limitation recited in claims 1, 17 and 33 and many of the depending claims is that each of the TCL modules communicate with an external device that is located away from the computer system as opposed to communicating within the computer system. In fact, the TCL modules of the

present patent application are capable of communicating with external devices that are up to 30 feet away from the processor.

The combination of Lambrecht in view of Lueck does not disclose or suggest these claim features. In particular, the combination of Lambrecht in view of Lueck does not disclose or suggest having multiple TCL modules that can communicate in parallel with their associated external devices with low latency. Lambrecht describes a method for transferring real-time data within a computer system and not for transferring data to external devices with low latency as in the claimed invention. Lambrecht frequently uses the terms "within the processor system", "within the computer system" and "real-time communications". In addition, Lambrecht teaches that the multimedia devices are not external to the computer system (col. 8, lines 11-19) and thus the PCI bus of Lambrecht is not transferring data outside the computer system with low latency. Lueck describes a method for maintaining the isochrony of data. In particular, Lueck is concerned with sending isochronous data between the PCI bus, which has parallel data and a clock, and a PCIExpress bus, which has serial data and does not have a clock. The bus devices of Lueck are within the computer system and neither can be more than a few inches in length apart. In light of these teachings, Applicant submits that the combination of Lambrecht in view of Lueck does not disclose or suggest having multiple TCL modules that can communicate in parallel with external devices with low latency.

Because the combination of Lambrecht in view of Lueck does not disclose or suggest having multiple TCL modules that can communicate in parallel with external devices with low latency, Applicant submits that independent claims 1, 17 and 33 are patentably distinguishable over the combination. Claims 3-16; 19-32; and 34 depend directly or indirectly from now presumably allowable claims 1, 17 and 33, respectively, and thus are in allowable condition by dependency. Accordingly, Applicant requests that the Examiner reconsider and remove the §103(a) rejection of claims 1, 3-17 and 19-34 under the combination of Lambrecht in view of Lueck.

In view of the foregoing amendments and remarks, Applicant requests that the Examiner reconsider this application and allow claims 1, 3-17 and 19-34.

If the Examiner has any questions regarding the present patent application, the Examiner can call Applicant's attorney, David C. Goldman, at telephone number (518)-449-0044.

Respectfully submitted,

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